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*Pro Hac Vice* application filed for:  
Robert Garson, Esq.  
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Attorneys for Matthew Taibbi

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

MATTHEW TAIBBI,

Plaintiff,

Civil Action No.: 2:25-cv-02275-EP-LDW

v.

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
ROBERT D. GARSON, ESQ.  
*PRO HAC VICE***

SYDNEY KAMLAGER-DOVE,  
Defendant.

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X

**PLEASE TAKE NOTICE** that on April 11, 2025 at 10:00 a.m., or as soon as counsel may be heard, the undersigned shall move, before the District Court Judge for the United States District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07102, for an Order granting Robert D. Garson to appear in this matter *Pro Hac Vice*

for the purpose of assisting in the representation of Attorneys for Plaintiff Matthew Taibbi ("Plaintiff").

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, counsel for Plaintiff will rely upon the accompanying Certification of Michael Steinmetz, Esq., submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

DATED: April 4, 2025  
New York, NY

Respectfully submitted,

**Garson Segal  
Steinmetz Fladgate LLP**

/s/ Michael Steinmetz  
Michael Steinmetz (MS-3164)

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